

BAKER & HOSTETLER LLP

45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Nicholas J. Cremona
Michael R. Matthias

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JAMES HELLER FAMILY, LLC, ESTATE OF
JAMES HELLER, BARBARA H. FRIETAG, as
personal representative and as an individual, STEVEN
P. HELLER, as personal representative and as an
individual, HARRY H. FALK, as personal
representative, STEVEN P. HELLER REVOCABLE
TRUST, a Florida trust, ROBERT P. SALTSMAN, as

Adv. Pro. No. 10-05419 (SMB)

trustee, EVE FRIETAG, ELIZABETH FRIETAG DRANOFF, TRUST FBO AN.D. [a minor] UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, BARBARA H. FRIETAG, as trustee, TRUST FBO AL.D. [a minor] UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, BARBARA H. FRIETAG, as trustee, TRUST FBO S.H. [a minor] UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, TRUST FBO KATHERINE HELLER UNDER ARTICLES SIXTH AND EIGHTH OF THE LAST WILL AND TESTAMENT OF JAMES HELLER, a New York trust, STEVEN P. HELLER, as trustee, KATHERINE HELLER, and ELEANOR LEACOCK,

Defendants.

AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures have been exchanged
2. Fact Discovery shall be completed by: June 15, 2015
3. The Disclosure of Case-in-Chief Experts shall be due: September 14, 2015
4. The Disclosure of Rebuttal Experts shall be due: October 15, 2015
5. The Deadline for Completion of Expert Discovery shall be: January 13, 2016
6. The Deadline to File a Notice of Mediation Referral shall be: March 14, 2016

7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: March 28, 2016
8. The Deadline for Conclusion of Mediation shall be: July 25, 2016

Dated: New York, New York
December 17, 2014

Of Counsel:

BAKER & HOSTETLER LLP
11601 Wilshire Boulevard, Suite 1400
Los Angeles, California 90025-0509
Telephone: 310.820.8800
Facsimile: 310.820.8859
Michael R. Matthias
Email: mmatthias@bakerlaw.com
Michael J. Durkheimer
Email: mdurkheimer@bakerlaw.com

BAKER & HOSTETLER LLP

By: s/ Nicholas J. Cremona

David J. Sheehan
Marc E. Hirschfield
Nicholas J. Cremona
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and for the Estate of Bernard L. Madoff*